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FILED

JUN 10 2025

DEPT. OF REAL ESTATE

By- 

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation against
12 JON MICHAEL WOODS,
13 Respondent.

DRE No. H-42730 LA

OAH No. 2024070361

SECOND AMENDED
ACCUSATION

15 **This Second Amended Accusation amends the Accusation filed on March 19, 2025.**

16 The Complainant, Ray Dagnino, a Supervising Special Investigator for the Department of Real
17 Estate¹ ("Department") of the State of California, for cause of Accusation against JON
18 MICHAEL WOODS, aka Jon M. Woods and Jon Woods ("Respondent"), is informed and
19 alleges as follows:

20 1. The Complainant, Ray Dagnino, a Supervising Special Investigator for the
21 Department, makes this Accusation in his official capacity.
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23
24 ¹ Between July 1, 2013, and July 1, 2018, the Department of Real Estate operated as the Bureau of Real Estate under the Department of Consumer Affairs.

2. Respondent is presently licensed and/or has license rights under the Real Estate Law (Part 1 of Division 4 of the Code²).

3. On March 11, 2000, the Department issued a real estate broker license to Respondent, License ID 00798546. Respondent's license expired on March 18, 2024. Respondent has renewal rights pursuant to Code section 10201. The Department retains jurisdiction pursuant to Code section 10103. Respondent was formerly licensed as a real estate salesperson from approximately November 5, 1980, through March 10, 2000.

FIRST CAUSE OF ACCUSATION

State Bar Disciplinary Action SBC-19-O-30236

4. Code section 10177, subdivision (f), provides that the Real Estate Commissioner may suspend or revoke the license of a real estate licensee if a licensee has acted or conducted himself in a manner that would have warranted the denial of their application for a real estate license, either had a license denied or had a license issued by another agency of this state, another state, or the federal government revoked, surrendered, or suspended, or received an order of debarment, for acts that, if done by a real estate licensee, would be grounds for the suspension or revocation of a California real estate license, if the action of denial, revocation, surrender, suspension, or debarment by the other agency or entity was taken only after giving the licensee or applicant fair notice of the charges, an opportunity for a hearing, and other due process protections comparable to the Administrative Procedure Act (Chapter 3.5 (commencing with Section 11340), Chapter 4 (commencing with Section 11370), and Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code), and only upon an express finding of a violation of law by the agency or entity.

² Unless otherwise noted, all references to the "Code" are to the California Business and Professions Code, all references to the "Real Estate Law" are to Part 1 of Division 4 of the Code, and all references to "Regulations" are to the Regulations of the Real Estate Commissioner, California Code of Regulations, Title 10, Chapter 6.

1 5. Respondent was admitted to practice law in the State of California on
2 December 19, 1995.

3 6. On May 22, 2019, the Office of Chief Trial Counsel ("OCTC") of the State Bar
4 of California filed a Notice of Disciplinary Charges ("NDC") against Respondent in Case No.
5 SBC-19-O-30236. The OCTC then filed a first amended NDC on June 5, 2019, to which
6 Respondent was charged with: 1) having a conflict of interest with a client; 2) having a conflict
7 in a client's subject matter; 3) conducting a business transaction with a client without proper
8 warnings; 4) acquiring an interest adverse to a client; 5) breaching the duty of loyalty; 6) failing
9 to withdraw from representation when required; 7) failing to notify a client of the employment
10 of a disbarred attorney (two counts); 8) aiding a disbarred attorney in the unauthorized practice
11 of law; 9) failing to deposit funds in a trust account; 10) committing moral turpitude for
12 misappropriating funds; and 11) failing to pay out client funds promptly.

13 7. Respondent filed a response on June 27, 2019. Following the trial on the
14 contested disciplinary matter, Respondent was found culpable of Count Six (failure to withdraw
15 when mandatory) Counts Seven and Eight (failure to notify a client of employment of a
16 disbarred attorney) and Count Nine (aiding the unauthorized practice of law). The remaining
17 counts were dismissed with prejudice.

18 8. On or about March 1, 2021, the Supreme Court of California issued an Order in
19 Case No. S265120. Respondent was suspended from the practice of law for one year, execution
20 of the suspension was stayed, and Respondent was placed on probation for two years subject to
21 certain conditions, including passing the Multistate Professional Responsibility Examination
22 and paying costs to the State Bar.

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9. Respondent's acts, as described above in Paragraph 7, if done by a real estate licensee, would be grounds for the suspension or revocation of a real estate license pursuant to Code sections 10130, **10137**, 10176, **subdivisions (a), and/or (i), and 10177, subdivisions (d) and/or (g).**

10. The suspension of Respondent's license to practice law constitutes cause for the suspension or revocation of Respondent's real estate license and license rights pursuant to Code section 10177, subdivision (f).

SECOND CAUSE OF ACCUSATION

State Bar Disciplinary Action SBC-22-C-30904

11. There is hereby incorporated in this Second, separate and distinct Cause of Accusation all of the allegations contained in Paragraphs 1 through 10, with the same force and effect as if herein fully set forth.

12. On or about September 15, 2022, the OCTC submitted a transmittal of Records of Conviction, following Respondent's felony convictions described below in Paragraphs 21 and 23. On or about November 14, 2022, Respondent's license to practice law was placed on interim suspension pending final resolution of that proceeding. Respondent is currently not eligible to practice law.

13. The suspension of Respondent's license to practice law constitutes cause for the suspension or revocation of Respondent's real estate license and license rights pursuant to Code section 10177, subdivisions (f) and (b).

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1 THIRD CAUSE OF ACCUSATION

2 Failure to Timely Report - Code section 10186.2

3 14. There is hereby incorporated in this Third, separate and distinct Cause of
4 Accusation, all of the allegations contained in Paragraphs 1 through 13, above, with the same
5 force and effect as if herein fully set forth.

6 15. Code section 10186.2 states:

7 “(a) (1) A licensee shall report any of the following to the department:

8 (A) The bringing of a criminal complaint, information, or indictment charging a
9 felony against the licensee.

10 (B) The conviction of the licensee, including any verdict of guilty, or plea of
11 guilty or no contest, of any felony or misdemeanor.

12 (C) Any disciplinary action taken by another licensing entity or authority of this
13 state or of another state or an agency of the federal government.

14 (2) The report required by this subdivision shall be made in writing within 30 days
15 of the date of the bringing of the indictment or the charging of a felony, the conviction, or
16 the disciplinary action.”

17 16. A diligent search was made of the Department’s records for Respondent and no
18 record or written notice was found to have been timely received from Respondent, notifying the
19 Department of the bringing of the charging of the felonies, the felony convictions, the State Bar
20 disciplinary actions against Respondent, or the suspension of Respondent’s license to practice
21 law, as described herein, in Paragraphs 6 through 12, 19, 21, and 23, within 30 days of said
22 actions.

23 17. Respondent’s failure to provide timely written notice to the Department pursuant
24 to Code section 10186.2 constitutes cause for the suspension or revocation of Respondent’s real

1 estate license and license rights under Code section 10186.2, subdivision (b), and section 10177,
2 subdivisions (d) and/or (g).

3 FOURTH CAUSE OF ACCUSATION

4 Convictions

5 18. There is hereby incorporated in this Fourth, separate and distinct Cause of
6 Accusation, all of the allegations contained in Paragraphs 1 through 17, above, with the same
7 force and effect as if herein fully set forth.

8 19. On or about June 05, 2017, a Felony Complaint Warrant was filed against
9 Respondent, before the before the Superior Court of California, County of Orange, in Case No.
10 17CF1373. Amendments to the Felony Complaint were filed on January 8, 2018, and February
11 14, 2018. On March 23, 2018, an Information was filed against Respondent in Case No.
12 17CF1373. Multiple amendments to the Information were filed between August 24, 2018, and
13 December 10, 2019.

14 20. In April of 2019, Wood's first trial ended in a mistrial when a jury was unable to
15 reach a unanimous decision. A second trial took place in August of 2022, and the jury found
16 Woods guilty on all counts.

17 21. On or about October 21, 2022, before the Superior Court of California, County
18 of Orange, in Case No. 17CF1373, Respondent was found guilty by a jury and convicted of
19 violating one count of Penal Code section 182(a)(1) (conspire to commit a crime); three counts
20 of Penal Code section 549 (false and fraudulent claim); and 33 counts of Penal Code section
21 550(b)(3) (insurance fraud), all felonies. Respondent was also found guilty of an enhancement
22 pursuant to Penal Code 186.11(1)(1)/(2) (aggravated white collar crime). Respondent was
23 sentenced to serve four years in state prison and pay total restitution of \$701,452.00.

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1 22. Respondent appealed his convictions described above in Paragraph 21 before the
2 Fourth District Court of Appeal, Division Three, Case No. G061948.

3 23. On or about March 18, 2025, the Court of Appeal of the State of California,
4 Fourth Appellate District, Division Three, issued an Opinion in Case No. G061948, which
5 affirmed in part and reversed in part, the judgment of the Superior Court of California of
6 Orange County, in Case No. 17CF1373. Counts 5 through 37 were reversed, as well as the
7 white-collar enhancement based solely on Counts 5 through 37, and the restitution award in
8 favor of the insurance company, which was also likely based on Counts 5 through 37. As to
9 Counts 1 through 4, the judgment was affirmed and Respondent still stands convicted of
10 violating one count of Penal Code section 182(a)(1) (conspire to commit a crime) and three
11 counts of Penal Code section 549 (false and fraudulent claim), felonies.

12 24. The convictions for Counts 1 through 4, alleged above in Paragraph 23, and the
13 underlying circumstances surrounding said convictions, bear a substantial relationship to the
14 qualifications, functions, or duties of a real estate licensee under Regulations 2910 and 2910.5.

15 25. Respondent's felony convictions for Counts 1 through 4, alleged above in
16 Paragraph 23 constitute cause for the suspension or revocation of all licenses and license rights
17 of Respondent pursuant to Code sections 490 and 10177, subdivision (b).

18 COST RECOVERY

19 26. Code Section 10106 provides, in pertinent part, that in any order issued in
20 resolution of a disciplinary proceeding before the Department, the Commissioner may request
21 the Administrative Law Judge to direct a licensee found to have committed a violation of this
22 part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the
23 case.

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BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

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In the Matter of the Accusation against
JON MICHAEL WOODS,
Respondent.

DRE No. H-42730 LA

OAH No. 2024070361

FIRST AMENDED
ACCUSATION

This First Amended Accusation amends the Accusation filed on January 29, 2024.

The Complainant, Ray Dagnino, a Supervising Special Investigator for the Department of Real Estate¹ ("Department") of the State of California, for cause of Accusation against JON MICHAEL WOODS, aka Jon M. Woods and Jon Woods ("Respondent"), is informed and alleges as follows:

1. The Complainant, Ray Dagnino, a Supervising Special Investigator for the Department, makes this Accusation in his official capacity.

¹ Between July 1, 2013, and July 1, 2018, the Department of Real Estate operated as the Bureau of Real Estate under the Department of Consumer Affairs.

2. Respondent is presently licensed and/or has license rights under the Real Estate Law (Part 1 of Division 4 of the Code²).

3. **On March 11, 2000, the Department issued a real estate broker license to Respondent, License ID 00798546. Respondent's license expired on March 18, 2024.**

Respondent has renewal rights pursuant to Code section 10201. The Department retains jurisdiction pursuant to Code section 10103. Respondent was formerly licensed as a real estate salesperson from approximately November 5, 1980, through March 10, 2000.

FIRST CAUSE OF ACCUSATION

State Bar Disciplinary Action SBC-19-O-30236

4. Code section 10177, subdivision (f), provides that the Real Estate Commissioner may suspend or revoke the license of a real estate licensee if a licensee has acted or conducted themselves in a manner that would have warranted the denial of their application for a real estate license, either had a license denied or had a license issued by another agency of this state, another state, or the federal government revoked, surrendered, or suspended, or received an order of debarment, for acts that, if done by a real estate licensee, would be grounds for the suspension or revocation of a California real estate license, if the action of denial, revocation, surrender, suspension, or debarment by the other agency or entity was taken only after giving the licensee or applicant fair notice of the charges, an opportunity for a hearing, and other due process protections comparable to the Administrative Procedure Act (Chapter 3.5 (commencing with Section 11340), Chapter 4 (commencing with Section 11370), and Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code), and only upon an express finding of a violation of law by the agency or entity.

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1 5. Respondent was admitted to practice law in the State of California on
2 December 19, 1995.

3 6. On May 22, 2019, the Office of Chief Trial Counsel ("OCTC") of the State Bar
4 of California filed a Notice of Disciplinary Charges ("NDC") against Respondent in Case No.
5 SBC-19-O-30236. The OCTC then filed a first amended NDC on June 5, 2019, to which
6 Respondent was charged with: 1) having a conflict of interest with a client; 2) having a conflict
7 in a client's subject matter; 3) conducting a business transaction with a client without proper
8 warnings; 4) acquiring an interest adverse to a client; 5) breaching the duty of loyalty; 6) failing
9 to withdraw from representation when required; 7) failing to notify a client of the employment
10 of a disbarred attorney (two counts); 8) aiding a disbarred attorney in the unauthorized practice
11 of law; 9) failing to deposit funds in a trust account; 10) committing moral turpitude for
12 misappropriating funds; and 11) failing to pay out client funds promptly.

13 7. Respondent filed a response on June 27, 2019. Following the trial on the
14 contested disciplinary matter, Respondent was found culpable of Count Six (failure to withdraw
15 when mandatory) Counts Seven and Eight (failure to notify a client of employment of a
16 disbarred attorney) and Count Nine (aiding the unauthorized practice of law). The remaining
17 counts were dismissed with prejudice.

18 8. On or about March 1, 2021, the Supreme Court of California issued an Order in
19 Case No. S265120. Respondent was suspended from the practice of law for one year, execution
20 of the suspension was stayed, and Respondent was placed on probation for two years subject to
21 certain conditions, including passing the Multistate Professional Responsibility Examination
22 and paying costs to the State Bar.

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1 9. Respondent's acts, as described above in Paragraph 7, if done by a real estate
2 licensee, would be grounds for the suspension or revocation of a real estate license pursuant to
3 Code sections 10130, **10145**, 10176, subdivision (a), and 10176, subdivision (i).

4 10. The suspension of Respondent's license to practice law constitutes cause for the
5 suspension or revocation of Respondent's real estate license and license rights pursuant to Code
6 section 10177, subdivision (f).

7 SECOND CAUSE OF ACCUSATION

8 State Bar Disciplinary Action SBC-22-C-30904

9 11. There is hereby incorporated in this Second, separate and distinct Cause of
10 Accusation all of the allegations contained in Paragraphs 1 through 10, with the same force and
11 effect as if herein fully set forth.

12 12. On or about September 15, 2022, the OCTC submitted a transmittal of Records of
13 Conviction, following Respondent's felony convictions described below in **Paragraphs 21 and**
14 **23**. On or about November 14, 2022, Respondent's license to practice law was placed on interim
15 suspension pending final resolution of that proceeding. Respondent is currently not eligible to
16 practice law.

17 13. The suspension of Respondent's license to practice law constitutes cause for the
18 suspension or revocation of Respondent's real estate license and license rights pursuant to Code
19 section 10177, **subdivisions (f) and (b)**.

20 THIRD CAUSE OF ACCUSATION

21 Failure to Timely Report - Code section 10186.2

22 14. There is hereby incorporated in this **Third**, separate and distinct Cause of
23 Accusation, all of the allegations contained in Paragraphs 1 through 13, above, with the same
24 force and effect as if herein fully set forth.

1 15. Code section 10186.2 states:

2 “(a) (1) A licensee shall report any of the following to the department:

3 (A) The bringing of a criminal complaint, information, or indictment charging a
4 felony against the licensee.

5 (B) The conviction of the licensee, including any verdict of guilty, or plea of
6 guilty or no contest, of any felony or misdemeanor.

7 (C) Any disciplinary action taken by another licensing entity or authority of this
8 state or of another state or an agency of the federal government.

9 (2) The report required by this subdivision shall be made in writing within 30 days
10 of the date of the bringing of the indictment or the charging of a felony, the conviction, or
11 the disciplinary action.”

12 16. A diligent search was made of the Department’s records for Respondent and no
13 record or written notice was found to have been timely received from Respondent, notifying the
14 Department of the bringing of the charging of the felonies, the felony convictions, the State Bar
15 disciplinary actions against Respondent, or the suspension of Respondent’s license to practice
16 law, as described herein, in **Paragraphs 6 through 12, 19, 21, and 23**, within 30 days of said
17 actions.

18 17. Respondent’s failure to provide timely written notice to the Department pursuant
19 to Code section 10186.2 constitutes cause for the suspension or revocation of Respondent’s real
20 estate license and license rights under Code section 10186.2, subdivision (b), and section 10177,
21 subdivisions (d) and/or (g).

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1 **FOURTH CAUSE OF ACCUSATION**

2 **Convictions**

3 18. There is hereby incorporated in this Fourth, separate and distinct Cause of
4 Accusation, all of the allegations contained in Paragraphs 1 through 17, above, with the
5 same force and effect as if herein fully set forth.

6 19. On or about June 05, 2017, a Felony Complaint Warrant was filed against
7 Respondent, before the before the Superior Court of California, County of Orange, in
8 Case No. 17CF1373. Amendments to the Felony Complaint were filed on January 8, 2018,
9 and February 14, 2018. On March 23, 2018, an Information was filed against Respondent
10 in Case No. 17CF1373. Multiple amendments to the Information were filed between
11 August 24, 2018, and December 10, 2019.

12 20. In April of 2019, Wood's first trial ended in a mistrial when a jury was
13 unable to reach a unanimous decision. A second trial took place in August of 2022, and the
14 jury found Woods guilty on all counts.

15 21. On or about October 21, 2022, before the Superior Court of California,
16 County of Orange, in Case No. 17CF1373, Respondent was found guilty by a jury and
17 convicted of violating one count of Penal Code section 182(a)(1) (conspire to commit a
18 crime); three counts of Penal Code section 549 (false and fraudulent claim); and 33 counts
19 of Penal Code section 550(b)(3) (insurance fraud), all felonies. Respondent was also found
20 guilty of an enhancement pursuant to Penal Code 186.11(1)(1)/(2) (aggravated white collar
21 crime). Respondent was sentenced to serve four years in state prison and pay total
22 restitution of \$701,452.00.

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1 22. Respondent appealed his convictions described above in Paragraph 21
2 before the Fourth District Court of Appeal, Division Three, Case No. G061948.

3 23. On or about March 18, 2025, the Court of Appeal of the State of California,
4 Fourth Appellate District, Division Three, issued an Opinion in Case No. G061948, which
5 affirmed in part and reversed in part, the judgment of the Superior Court of California of
6 Orange County, in Case No. 17CF1373. Counts 5 through 37 were reversed, as well as the
7 white-collar enhancement based solely on Counts 5 through 37, and the restitution award
8 in favor of the insurance company, which was also likely based on Counts 5 through 37.
9 As to Counts 1 through 4, the judgment was affirmed and Respondent still stands
10 convicted of violating one count of Penal Code section 182(a)(1) (conspire to commit a
11 crime) and three counts of Penal Code section 549 (false and fraudulent claim), felonies.

12 24. The convictions for Counts 1 through 4, alleged above in Paragraph 23, and
13 the underlying circumstances surrounding said convictions, bear a substantial relationship
14 to the qualifications, functions, or duties of a real estate licensee under Regulations 2910
15 and 2910.5.

16 25. Respondent's felony convictions for Counts 1 through 4, alleged above in
17 Paragraph 23 constitute cause for the suspension or revocation of all licenses and license
18 rights of Respondent pursuant to Code sections 490 and 10177, subdivision (b).

19 COST RECOVERY

20 26. Code Section 10106 provides, in pertinent part, that in any order issued in
21 resolution of a disciplinary proceeding before the Department, the Commissioner may request
22 the Administrative Law Judge to direct a licensee found to have committed a violation of this
23 part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the
24 case.

1 WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this
2 Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action
3 against all licenses and license rights of Respondent under the Real Estate Law (Part 1 of
4 Division 4 of the Business and Professions Code), for the cost of investigation and enforcement
5 as permitted by law, and for such other and further relief as may be proper under other
6 provisions of law.

7 Dated Mar 19, 2025, at Los Angeles, California.

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9 
10 RAY DAGNINO
11 Supervising Special Investigator
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13 cc: Jon Michael Woods
14 Ray Dagnino
15 Sacto.
16 OAH
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